previously constructed queries or *selecting* between an originally constructed query and

a query from the store that is identified by a search tool, as set forth in the claims. As

indicated in the previous response, Molloy does not disclose or suggest a number of

specifically claimed features of the instant invention. For example, Molloy does not

disclose or suggest a store for database queries as set forth in the claimed invention. In

particular, according to Molloy, the queries are simply submitted to a conventional case-

based database so as to retrieve an ordered list of results (referred to as "concepts" in

Molloy, see, e.g., Col. 4, lines 29-38). The system of Molloy provides an arrangement by

which a dialog can occur between the user and the database in a cyclical fashion so as to

allow the adaptive learning system to present the most relevant results to the user (see

Col. 13, lines 26-43). However, the results from the database are not queries in the

context of the claimed invention, but instead relate to the information for assisting a help

desk for maintaining a network since the cases relate to problems in the network together

with associated diagnosis and implemented solution. Consequently, there is no

disclosure in Molloy of searching a store of previously constructed database queries

against a constructed query. Additionally, Molloy fails to disclose or suggest the feature

of selecting between the originally constructed query and a query located by a search of

the stored queries, so as to then submit the selected query to a database. In complete

distinction, in Molloy, the final results of the search are simply presented to the help desk

operator so they can advise appropriately on the solution to a network problem. *There is*

simply no teaching or suggestion anywhere in Molloy of providing a store of previously

constructed queries or selecting between an originally constructed query and a query

from the store that is identified by a search tool, as set forth in the claims.

It is respectfully submitted that Ferrel fails to overcome the fundamental deficiencies noted above with respect to Molloy, and thus, the proposed combination of Molloy and Ferrel fails to render the claimed invention obvious. Moreover, there is no motivation to combine the teachings of these disparate references to arrive at the claimed invention.

In particular, Ferrel discloses an on-line publishing system for titles such as newspapers, journals, and the like. In the system of Ferrel, the title format (layout, design, etc.) is separated from the title content, thereby purportedly enabling ease of updating news stories, pictures, etc. without requiring updating of the entire title design. When displaying a title, the relevant section layouts are obtained first, and then populated using the appropriate content (e.g., articles, pictures, etc.) retrieved from a database. This content is retrieved from the database by searching according to predefined criteria. The predefined criteria are specified in "search objects" associated with a section/page layout, where each search object essentially includes a list of keywords and/or an indication of which directories to limit the search to (see, e.g., Col. 7, lines 31-40, Col. 16, lines 41-48 and Col. 25, lines 50-53). The text referred to in the Office Action relates to a number of tables including a "Search Object Table" which relates each query to a search object ID. This search object table is alleged in the Office Action to meet the currently claimed feature of a store for storing database queries.

This characterization of Ferrel in the Office Action is simply incorrect. The search object table in Ferrel is used when displaying a title to obtain the queries which need to be run to retrieve the relevant content. The queries are obtained by mapping a list

4

of identified search objects to the entries in the table (see, e.g., Col. 28, line 65 to Col. 29, line 7). It is manifestly clear that this is not the same as "searching the query store against a constructed query" as specifically recited in the claims, because the queries of Ferrel are retrieved from the table using a specified list of known ID values, and _not_ in response to a search against a constructed query.

Moreover, the proposed combination of Molloy and Ferrel is entirely improper and is made in an impermissible hindsight manner. In particular, as explained above, the search object table in Ferrel associates a plurality of queries with specific identifiers. As such, this type of table is only suitable for use within a system which searches a store of database queries using known identifiers, which is not the case in Molloy, where different network problems encountered by the help desk mean that queries are input manually and will be different each time depending upon the situation and the operator. For at least this reason, the proposed combination would be entirely unsuitable. Moreover, it may be disadvantageous to provide a query store to save most of the queries performed on the database of Molloy because, as discussed above, the system of Molloy operates in a cyclical manner to narrow down the results from the database with the previous queries implicitly being discarded as being useless each time a set of results has been retrieved. For at least this reason it would be inherently undesirable to save these redundant queries in a query store, and an additional step to search such a store would simply result in added cost and complexity of the system without any resulting benefit.

Additionally, it is inappropriate to combine the teachings of Molloy and Ferrel because of the completely disparate fields to which they relate. Molloy relates to an

5

adaptive learning system for a case-based reasoning system, while Ferrel relates to an on-line publishing system, and in particular the section referred to in the Office Action relates to a table for mapping a list of identified queries which will be run to find the content when displaying a title on line. This combination would readily appear to one of skill in the art to be an inherently unsuitable combination.

Therefore, it is respectfully submitted that the proposed combination of Molloy and Ferrel is improper. Moreover, even if, *arguendo*, the combination of Molloy and Ferrel were proper, the combination nevertheless fails to render the claimed invention obvious. For example, neither of the references, either singly or in combination , disclose, teach or suggest the feature of searching a query store against a constructed query or selecting between a constructed query and one located by the search of the query store. Accordingly, neither of the references, either singly or in combination, renders the claimed invention obvious. Thus, reconsideration and withdrawal of the rejection are respectfully submitted.

In view of the foregoing amendments and remarks, it is respectfully submitted that the entire application is in condition for allowance. Favorable reconsideration of the application and prompt allowance of the claims are earnestly solicited.

Should the Examiner deem that further issues require resolution prior to

allowance, the Examiner is invited to contact the undersigned attorney of record at the

telephone number set forth below.

Respectfully submitted,

NIXON & VANDERHYE P.C.

(signature)

Updeep S. Gill
Registration No. 37,334

USG:led

1100 North Glebe Road
8th Floor
Arlington, Virginia 22201
Telephone: (703) 816-4000
Facsimile: (703) 816-4100

MARKED-UP VERSION OF AMENDED AND NEWLY ADDED CLAIMS

1.   (*Twice Amended*)   A database access tool comprising:

means for constructing database queries;

a query store for storing <u>previously constructed</u> database queries, said

query store being separate from said database;

a search tool for searching the query store against a constructed query; and

query submission means for selecting between a constructed query and a

query located against it <u>from the query store</u> by the search tool, and for submitting the

selected query to a database.

6.   (*Amended*)   A method of accessing a database, the method comprising:

constructing a database query;

searching a query store containing <u>previously constructed</u> database queries

against the constructed query, said query store being separate from said database;

selecting between the constructed query and a query located against it

<u>from the query store of previously constructed queries</u> during the searching step; and

submitting the selected query to the database.